

JACOBS & BARBONE, P.A.

EDWIN J. JACOBS, JR.
ejacobs@jacobsbarbone.law

LOUIS M. BARBONE
lbarbone@jacobsbarbone.law

A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
1125 PACIFIC AVENUE
ATLANTIC CITY, NEW JERSEY 08401
PHONE: (609) 348-1125
FAX: (609) 348-3774
WEBSITE: WWW.JACOBSBARBONE.LAW

PATRICK C. JOYCE
pjoyce@jacobsbarbone.law

JOEL S. JUFFE
jjuffe@jacobsbarbone.law

TIMOTHY C. ALEXANDER
talexander@jacobsbarbone.law

May 14, 2018

Via ECF

Honorable Richard J. Sullivan
United States District Court
Southern District of New York
40 Foley Square, Room 2104
New York, NY 10007

RE: U.S. v. Joseph Merlino
Docket No. 16-CR-522 (RJS)
Our File No. 15,327

Dear Judge Sullivan:

As Your Honor is aware, our law firm represents Defendant Joseph Merlino in the above-captioned matter. Following the entry of Mr. Merlino's guilty plea on April 27, 2018 Your Honor continued bail and removed the electronic monitoring requirement.

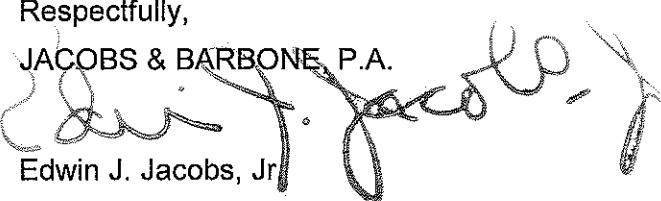
Mr. Merlino respectfully requests that he be permitted to travel from Florida to Pennsylvania from Wednesday May 16, 2018 through Monday May 21, 2018 in order to attend his daughter's graduation from Villanova University. I am making this request and bringing it to Your Honor's attention out of an abundance of caution because this was not expressly addressed in Mr. Merlino's August 12, 2016 Appearance Bond entered by United States Magistrate Judge William Matthewman.

Federal Probation Officer Scott Kirsche has indicated that he has no objection to this request. AUSA Max Nicholas has indicated that the Government does not object to this request.

Thank you for Your Honor's time and consideration.

Respectfully,

JACOBS & BARBONE, P.A.


Edwin J. Jacobs, Jr.

SO ORDERED:

Honorable Richard J. Sullivan, U.S.D.J.

cc: AUSA Max Nicholas (via ecf & email)
cc: Senior United States Probation Officer Scott Kirsche (via email)